Alan F. Ciamporcero Vice President 1275 Pennsylvania Avenue, N.W., Suitc 400 Washington, D.C. 20004 (202) 383-6416

PACIFIC TELESIS... Group-Washington

EX PARTE OR LATE FILED

March 27, 1996

DOCKET FILE COPY ORIGINAL

EX PARTE

William F. Caton Acting Secretary Federal Communications Commission Mail Stop 1170 1919 M Street, N.W., Room 222 Washington, D.C. 20554 RECEIVED MAR 2 7 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket No. 95-116 - Telephone Number Portability

Alan & Ciamporcero Joseph

Dear Mr. Caton:

Attached are the responses to the FCC data request on interim number portability. Please associate this material with the above-referenced docket.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Attachment

cc: Matt Harthun Susan McMaster

No. of Copies rec'd

TO:

Jerry Abercrombie

FROM:

Jim Ramsey

DATE:

Thursday, March 21, 1996

SUBJECT: FCC INP Data Request

= Attached are the responses to the FCC data request on interim number portability using RCF or DID.

As discussed, we are providing direct embedded costs at this time in lieu of incremental costs. Please inform me if in discussions with the FCC they request incremental costs to be provided in the future.

Please call me should you have any questions.

FCC Data Request - Interim Number Portability

Q.1 For both INP-RCF and DID, what are the incremental costs of providing number portability. Include diagram of how service is provided. Identify cost component for: termination; feature activation, call reorigination, transport, tandem switching, other operating costs, other cost components specific to Pacific Bell. Please identify cost on intraswitch and interswitch basis. Provide average number of ported calls for intra and interswitch.

= =

A.1 We are providing embedded direct costs at this time because incremental costs as described have not been developed. All costs are reflected on a per unit basis. The average number of ported calls are not provided concordant with unit costs.

For INP-RCF; call reorigination, transport, and tandem switching are assumed to be similar to Feature Group B (FGB) costs, thus these cost components are all included in the cost per minute for FGB. Additionally, FGB costs are assumed to be tandem interswitch calls, therefore intraswitch costs are not identified. The INP-RCF feature cost component is identified separately from the FGB cost.

DID costs consist of three cost components: the DID number block, the end office circuit termination, and the DID access trunk. The DID number and the functions of call termination, route indexing, digit outpulsing, and transport are all included in the these three cost components.

- Q.2 Provide administrative costs of INP-RCF and DID, such as billing, record keeping, service fees in turning service on and off for someone else.
- A.2 Administrative costs such as billing and record keeping are reported in the monthly recurring costs. The costs of turning service on and off are identified in the non-recurring costs.

The non-recurring costs for INP-INP-RCF (some pages may indicate DNCF, this is Pacific Bell's name for its INP version and stands for Directory Number Call Forwarding) differ whether the customer's existing service that is to be disconnected and replaced by INP-INP-RCF is POTS (residence or business or multiline hunt group [HML], or DID, or centrex. This is because additional activities are performed to convert these types of telephone numbers to an INP-INP-RCF number; activities which would not occur on a normal disconnect. Thus, non-recurring costs are shown separately by type of service being disconnected. Also, the costs for change and record type orders are shown in addition to new [in] and disconnect [out]. Changes to the INP-INP-RCF service after it in installed could include changing the forward-to number, for example. An example of a record order could be to change the billing name or address.

- Q.3 If any costs are not captured above, identify and specify.
- A.3 The cost of terminating the ported call on the connecting carrier's network would be equal to the rate charged by the terminating carrier for call termination. We did not attempt to make any assumption for these charges, for example, equal to FGB costs, therefore they are not captured. If known, they would be additive to the FGB costs.

Normally when providing embedded costs the FCC methodology requires adding common overhead costs such that the result is fully allocated embedded costs. For Pacific Bell, the additional common overhead typically added is in the range of 10% to 11% of the total unit cost. To expedite this data request response, the common overhead costs have not been calculated and included.

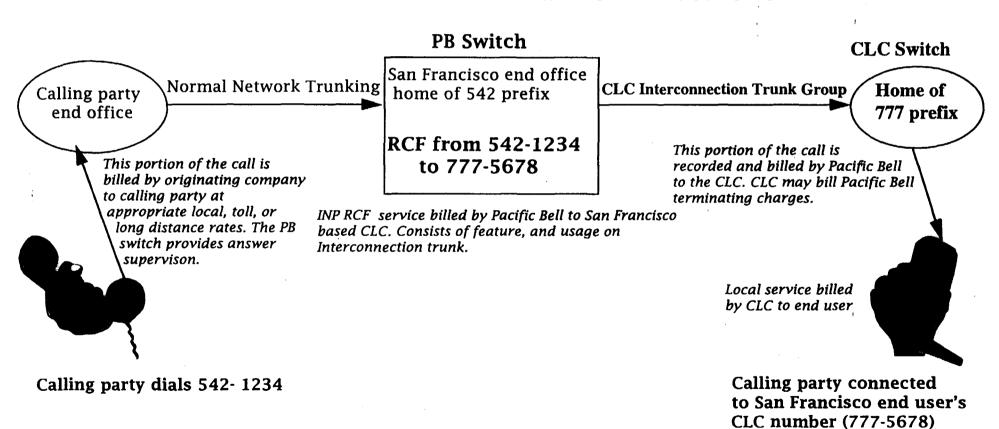
- Q.4 Does the number of ported calls affect the costs of interim number portability and explain cost relationship.
- A.4 No.

- Q.5 Is the cost per call dependent on number of minutes or messages, or dependent on number of lines.
- A.5 INP-RCF costs are dependent on number of minutes or messages. The INP-RCF usage (FGB cost) is expressed on a per minute basis.
- Q.6 If there are non-recurring costs, how long of a period are they recovered over.
- A.6 Our non-recurring costs include both service origination and termination (i.e. installation and disconnect). As long as both of these costs are included in the service fee and paid up front, there is no length of time required for cost recovery.
- Q.7 When identifying costs, tell how they are incurred, whether non-recurring, monthly, per minute or by message.
- A.7 These are idicated above and in attachments.

RCF Monthly Recurring Costs

INP Using RCF

San Francisco end user changes local service from Pacific Bell to a San Francisco based CLC



PRODUCT: RCF - BUS 17.2

FEATURE

in the second se	RECURRING	
<u> </u>	COST	
NETWORK STPPORT	18,233	
GENERAL SUPPORT	345,211	
CENTRAL OFFICE	16,790	
INFO. ORIGN./TERMIN.	0	
CABLE AND WIRE FACILITIES	0 -	
OTHER PROPERTY PLANT AND EQUIP.	3	
NETWORK OPERATIONS	711,683	
DEPRECIATION AND AMORTIZATION	658,739	
MARKETING	2,277,363	
CUSTOMER SERVICES	1,020,932	
EXECUTIVE AND PLANNING	0	
GENERAL AND ADMINISTRATIVE	871,947	
OFFICIAL COMPANY SERVICES	120,077	
OTHER	0	
EXPENSES	6,040,978	
INCOME TAX AT EQUITY RETURN REQUIRE	VIE 94,910	
OTHER OPERATING TAXES	85,944	
TAXES	180,854	
INTEREST AND RELATED ITEMS	105,287	
EQUITY RETURN REQUIREMENT	176,922	
MISCELLANEOUS	282,209	
TOTAL COST	6,504,041	
p-10-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1	····	
Average In-Service Volume	167,972	data from another program
LINET COOT		
UNIT COST	3.23	

RATE OF RETURN * *: 10.0%

A

PRODUCT : SWITCHED ACCESS IS - FGB - SURLOGATE FOR RCF USAGE

	RECURRING COST	
NETWORK SUPPORT GENERAL SUPPORT CENTRAL OFFICE INFO. ORIGN./TERMIN. CABLE AND WIRE FACILITES OTHER PROPERTY PLANT AND EQUIP. NETWORK OPERATIONS DEPRECIATION AND AMORTIZATION MARKETING CUSTOMER SERVICES EXECUTIVE AND PLANNING GENERAL AND ADMINISTRATIVE OFFICIAL COMPANY SERVICES	9,272 1,444,184 3,776,941 0 281,904 4,006,866 14,465,536 1,365,494 71,433 1,387,437 207,728	
EXPENSES	27,016,798	
INCOME TAX AT EQUITY RETURN REQUIREMENT OTHER OPERATING TAXES	3,109,222 1,449,610	
TAXES	4,558,832	
INTEREST AND RELATED ITEMS EQUITY RETURN REQUIREMENT	3.449.175 5,795,924	
MISCELLANEOUS	9,245,099	
TOTAL COST	40,820,729	
UNIT COST	.02	PER MINUTE

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10.0%

RATE OF RETURN * *:

RCF Non-recurring Costs

TOTAL

TOTAL

' TOTAL

UNBUNDLED - Direct Number Call Forwarding/ReF DIRECT EMBEDDED COSTS

			1	•			+	1	NEW	Disc.	NEW &
		SERVI	CE ORDER			CHANNE	L CONNECT	r	SERVICE	SERVICE	DISC.
Product Description	New	Disc.	Change	Record	New	Disc.	Change	Record	(A + E)	(B + F)	(l + J)
	(A)	(B)·	(C)	(D)	(E)	(F)	(G)	(H)	(1)	(J)	(K)
initial									,		
Disconnect POTS, Add DNCF	\$44.07	\$28.18	\$44.07	\$28.18	\$2.38	\$1.90	\$2.38	\$0.18	\$46.44	\$30.07	\$76.52
Disconnect DID, Add DNCF	\$44.07	\$28.18	\$44.07	\$28.18	\$14.96	\$1.90	\$2.38	\$0.18	\$59.02	\$30.07	\$89.10
Disconnect Centrex, Add DNCF	\$44.07	\$28.18	\$44.07	\$28.18	\$8.70	\$1.90	\$2.38	\$0.18	\$52.76	\$30.07	\$82.84
DNCF S TAND A LONE	\$44.07	\$28.18	\$44.07	\$28.18	\$3.72	\$1.90	\$2.38	\$0.18	\$47.79	\$30.07	\$77.87
Additional										,	
Disconnect POTS, Add DNCF	\$4.23	\$1.91	\$4.23	\$1.91	\$1.72	\$1.63	\$1.72	\$0.03	\$5.95	\$3.55	\$9.50
Disconnect DID, Add DNCF	\$4.23	\$1.91	\$4.23	\$1.91	\$4.17	\$1.63	\$1.72	\$0.03	\$8.40	\$3.55	\$11.95
Disconnect Centrex, Add DNCF	\$4.23	\$1.91	\$4.23	\$1.91	\$4.17	\$1.63	\$1.72	\$0.03	\$8.40	\$3.55	\$11.95
DNCF STAND ALON &	\$4.23	\$1.91	\$4.23	\$1.91	\$2.05	\$1.63	\$1.72	\$0.03	\$6.29	\$3.55	\$9.83

Assumptions:

New and disconnect costs recovered.

Product mix: 86.4% POTS; 7.8% DID; 5.8% Centrex.

NOTE: May not add due to rounding.

Product: Ref/DNCF - Disconnect End User (POTS/HML/COPT), Add DNCF -- Initial

WORK GROUPS	Bot <u>New</u>	toms Up Direct En <u>Disc.</u>	nbedded Unit Cost <u>Change</u>	Record
Service Order A. Sales LISC (Service Representative)	\$44.07	\$28.18	\$44.07	\$28.18
Total Service Order Cost	\$44.07	\$28.18	\$44.07	\$28.18
Channel Connect A. CSC - MLAC (FACS Administrator)	\$1.55	\$1.55	\$1.55	\$0.00
B. CSC - RCMA (RCMA Administrator)	\$0.20	\$0.20	\$0.20	\$0.00
C. CSC (Customer Service Associate)	\$0.45	\$0.00	\$0.45	\$0.00
D. CABS (Staff Associate)	\$0.18	\$0.15	\$0.18	\$0.18
_	\$2.38	\$1.90	\$2.38	\$0.18
Total Channel Connect Cost Total Product Cost	\$46.44	\$30.07	\$46.44	\$28.35

Note: May not add due to rounding

11

Product: Ref/DNCF - Disconnect End User (POTS/HML/COPT), Add DNCF -- Additional

	Bottoms Up Direct Embedded Unit Cost					
WORK GROUPS	New	Disc.	<u>Change</u>	Record		
Service Order A. Sales LISC (Service Representative)	\$4.23	\$1.91	\$4.23	\$1.91		
Total Service Order Cost	\$4.23	\$1.91	\$4.23	\$1.91		
Channel Connect A. CSC - MLAC (FACS Administrator)	\$1.55	\$1.55	\$1.55	\$0.00		
B. CSC - RCMA (RCMA Administrator)	\$0.08	\$0.08	\$0.08	\$0.00		
C. CSC (Customer Service Associate)	\$0.06	\$0.00	\$0.06	\$0.00		
D. CABS (Staff Associate)	\$0.03	\$0.00	\$0.03	\$0.03		
Total Channel Connect Cost	\$1.72	\$1.63	\$1.72	\$0.03		
Total Product Cost	\$5.95	\$3.55	\$5.95	\$1.94		

Note: May not add due to rounding

Product: Ref/DNCF - Disconnect DID, Add DNCF -- Initial

_	 •	

WORK GROUPS	Botto <u>New</u>	ms Up Direct Er <u>Disc.</u>	nbedded Unit Cos <u>Change</u>	t <u>Record</u>
Service Order	\$44.07	\$28.18	\$44.07	\$28.18
A. Sales LISC (Service Representative) Total Service Order Cost	\$44.07	\$28.18	\$44.07	\$28.18
Channel Connect A. CSC - MLAC (FACS Administrator)	\$1.35	\$1.55	\$1.55	\$0.00
B. CSC - RCMA (RCMA Administrator)	\$12.84	\$0.20	\$0.20	\$0.00
	\$0.39	\$0.00	\$0.45	\$0.00
C. CSC (Customer Service Associate)	\$0.38	\$0.15	\$0.18	\$0.18
D. CABS (Staff Associate)	\$14.96	\$1.90	\$2.38	\$0.18
Total Channel Connect Cost	\$59.02	\$30.07	\$46.44	\$28.35
Total Product Cost				

217.2

Product: Res/DNCF - Disconnect DID, Add DNCF -- Additional

		Bottoms Up Direct En	nbedded Unit Cost <u>Change</u>	Record
VORK GROUPS	New		\$4.23	\$1.91
Order	\$4.23	\$1.91	44.50	0.1
<u>Service Order</u> A. Sales LISC (Service Representative)	\$4.23	\$1.91	\$4.23	\$1.91
Total Service Order Cost		\$1.55	\$1.55	\$0.00
Channel Connect	\$1.55	\$1.50	00	\$0.00
A. CSC - MLAC (FACS Administra	\$2.53	\$0.08	\$0.08	
B. CSC - RCMA (RCMA Administrator)	\$0.06	\$0.00	\$0.06	\$0.00
C. CSC (Customer Service Associate)	\$0.03	\$0.00	\$0.03	\$0.0
D. CABS (Staff Associate)	\$4.17	\$1.63	\$1.72	\$0.0
Total Channel Connect Cost	\$8.40	\$3.55	\$5.95	\$1.9
Total Product Cost				

Product: Ref/DNCF - Disconnect Centrex, Add DNCF -- Initial

217.6

WORK GROUPS	Bo <u>New</u>	ottoms Up Direct En	nbedded Unit Cost <u>Change</u>	Record
Service Order A. Sales LISC (Service Representative)	\$44.07	\$28.18	\$44.07	\$28.18
A. Sales LISC (Service Reproductive) Total Service Order Cost	\$44.07	\$28.18	\$44.07	\$28.18
Channel Connect A. CSC - MLAC (FACS Administrator)	\$1.55	\$1.55	\$1.55	\$0.00
B. CSC - RCMA (RCMA Administrator)	\$6.52	\$0.20	\$0.20	\$0.00
C. CSC (Customer Service Associate)	\$0.45	\$0.00	\$0.45	\$0.00
D. CABS (Staff Associate)	\$0.18	\$0.15	\$0.18	\$0.18
	\$8.70	\$1.90	\$2.38	\$0.18
Total Channel Connect Cost Total Product Cost	\$52.76	\$30.07	\$46.44	\$28.35

Note: May not add due to rounding

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	S-440	one Un Direct Er	nbedded Unit Co	st Danard
WORK GROUPS	New Botto	Diag.	Change	
	\$4.23	\$1.91	\$4.23	\$1.91
Service Order A. Sales LISC (Service Rep)	\$4.23		\$4,23	\$1.91
	\$4.23	\$1.91	* • • • •	
Total Service Order Cost			\$1.55	\$0.00
Channel Connect	\$1.55	\$1.55		\$0.00
A. CSC - MLAC (FACS Administration	\$2.53	\$0.08	\$0.08	\$0.00
B. CSC - RCMA (RCMA Administrator)		\$0.00	\$0.06	\$0.00
C. CSC (Customer Service Associate)	\$0.06		\$0.03	\$0.03
	\$0.03	\$0.00		\$0.03
D. CABS (Staff Associate)	\$4.17	\$1.63	\$1.72	·
Total Channel Connect Cost	\$8.40	\$3.55	\$5.95	\$1.94

Note: May not add due to rounding

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Total Product Cost

DID Monthly Recurring Costs

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INP Using DID

San Francisco end user changes local service from Pacific Bell to a San Francisco based CLC

P*B End Office

542-1234 assigned as a DID number, has route indexing that routes calls to the DID trunk group and outpulses same last 4 digits, or replaces PacBell prefix with CLC 777 prefix and outpulses 7 digits.

DID Direct Trunk Group

-1234 or 777-1234

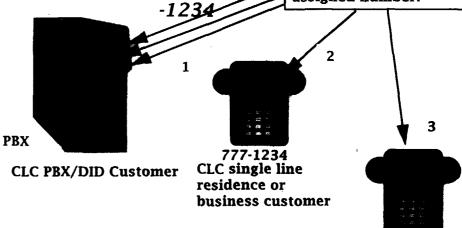
INP DID service billed by Pacific Bell to San Francisco based CLC. Consists of DID number block, route indexing, outpulsing, P*B end office trunk termination, and trunk.

CLC End Office

Terminates a call in 1 of 3 ways: 1) via DID trunks; 2) direct to a POTS line with same last 4 digits via assignment to OE; 3) by call forwarding via RCF to a different CLC assigned number.

The total call is billed by originating company to calling party at appropriate local, toll, or long distance rates. The CLC end office provides answer supervision.

Calling party dials 542-1234



DID Trunks

Local service billed by CLC to end user

CLC single line residence or business customer

777-5678

PRODUCT : DIRECT INWD DIAL - 100 NBR BLK

	RECURRING COST	
NETWORK SUPPORT GENERAL SUPPORT CENTRAL OFFICE INFO. ORIGN./TERMIN. CABLE AND WIRE FACILITES OTHER PROPERTY PLANT AND EQUIP. NETWORK OPERATIONS DEPRECIATION AND AMORTIZATION MARKETING CUSTOMER SERVICES EXECUTIVE AND PLANNING GENERAL AND ADMINISTRATIVE OFFICIAL COMPANY SERVICES OTHER	14,687 227,540 15,587 0 0 2 192,039 461,286 2.021,344 832,414 832,414 832,747	
EXPENSES	4,414,132	
INCOME TAX AT EQUITY RETURN REQUIREMENT OTHER OPERATING TAXES	116,827 69,974	
TAXES	186,801	
INTEREST AND RELATED ITEMS EQUITY RETURN REQUIREMENT	77.099 197,533	
MISCELLANEOUS	274,632	
TOTAL COST	4,875,565	
UNIT COST	7.93 RATE OF RETURN * *: 10.0%	

RECURRING COST

PRODUCT : DIRECT INWD DIAL - CKT TERML

NETWORK SUPPORT GENERAL SUPPORT CENTRAL OFFICE INFO. ORIGN./TERMIN. CABLE AND WIRE FACILITES OTHER PROPERTY PLANT AND EQUIP. NETWORK OPERATIONS DEPRECIATION AND AMORTIZATION MARKETING CUSTOMER SERVICES EXECUTIVE AND PLANNING GENERAL AND ADMINISTRATIVE OFFICIAL COMPANY SERVICES OTHER	7.235 1.393.159 2.420.739 0 0 2 2.138.591 5.752.018 1.084.555 520.519 0 827.079 123.003	
EXPENSES	14,266,900	
INCOME TAX AT EQUITY RETURN REQUIREMENT OTHER OPERATING TAXES	2.528.872 609.474	
TAXES	3,138,346	
INTEREST AND RELATED ITEMS EQUITY RETURN REQUIREMENT	1,868,910 4,275,873	
MISCELLANEOUS	5,944,783	
TOTAL COST	23,350,029	
UNIT COST	11.15	
	RATE OF RETURN * *: 10.0	%

PRODUCT : ACCESS TRUNKS - BUS

	RECURRING COST		3	
NETWORK SUPPORT GENERAL SUPPORT CENTRAL OFFICE INFO. ORIGN./TERMIN. CABLE AND WIRE FACILITES OTHER PROPERTY PLANT AND EQUIP. NETWORK OPERATIONS DEPRECIATION AND AMORTIZATION MARKETING CUSTOMER SERVICES EXECUTIVE AND PLANNING GENERAL AND ADMINISTRATIVE OFFICIAL COMPANY SERVICES OTHER	96,140 2,238,833 2,829,591 745,072 5,415,479 8,200,681 32,031,929 8,689,390 3,096,417 4,896,785 804,923		3 3 7 1	
EXPENSES	69,045,251			
INCOME TAX AT EQUITY RETURN REQUIREMENT OTHER OPERATING TAXES	6,287,370 2,901,572			
TAXES	9,188,942			
INTEREST AND RELATED ITEMS EQUITY RETURN REQUIREMENT	6,974,812 11,720,333			
MISCELLANEOUS	18,695,145			
TOTAL COST	96,929,338			1
UNIT COST	14.29			
	RATE OF RETURN * *:	10.0%		

DID Non-recurring Costs

11 21

Business PBX Trunks DIRECT EMBEDDED COSTS

	SERVICE ORDER				CHANNEL CONNECT			NEW DISC.	TOTAL DISC. SERVICE	TOTAL NEW & DISC.	
Product Description	New (A)	Disc. (B)	Change (C)	Record (D)	New (E)	Disc. (F)	Change (G)	(H)	= (A + E)	= (B + F) (J)	= (I + J) (K)
ACCESS TRUNKS - BUS BASIC - INITIAL	\$69.79	\$8.02	\$20.23	\$8.38	\$82.56	\$32.15	\$72.00	\$1.25	. \$152.34	\$40.17	\$192.51
*ACCESS TRUNKS - BUS BASIC + White Page Listing									1	1	\$194.42
DIRECT INWARD DIAL - 100 NUMBER BLOCK	\$0.00	\$0.00	\$0.00	\$0.00	\$15.82	\$4.49	\$7.17	\$0.00	\$15.82	\$4.49	\$20.31
DIRECT INWARD DIAL - CKT TERMINAL	\$0.00	\$0.00	\$0.00	\$0.00	\$15.82	\$4.49	\$7.17	\$0.00	\$15.82	\$4.49	\$20.31
* See Directory Listings Exhibit for Product Detail White Page Listings - Pacific Bell	\$0.61	\$0.08			\$1.10	\$0.12			\$1.71	\$0.20	\$1.91

Assumptions: New and Disconnect costs recovered.

NOTES:

Initial is the first line/trunk placed on a service order. Additional is the subsequent line/trunk placed on the same service order as the initial.

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Product: Access Trunks Basic - Business Initial

WORK GROUPS		,		
	<u>New</u>	Disc.	<u>Change</u>	Record
Service Order A. Service Representative	\$23.84	\$4.71	\$11.86	\$5.56
B. Order Writer	\$14.26	\$1.26	\$6.21	\$2.39
C. AE/ AET	\$2.22	\$0.14	\$0.14	\$0.06
D. Consultant	\$1.04	\$0.15	\$0.16	\$0.04
E. Manager	\$2.44	\$0.15	\$0.16	\$0.04
F. System Design Consultant	\$2.15	\$0.13	\$0.14	\$0.06
G. Sales Support Manager	\$23.83	\$1.47	\$1.55	\$0.20
H. Service Advisor	\$0.02	\$0.00	\$0.00	\$0.03
Total Service Order Cost	\$69.79	\$8.02	\$20.23	\$8.38
Channel Connect	•			
A. MLAC (FACS Administrator)	\$2.09	\$4.17	\$3.34	\$1.25
B. I & M (Services Technician)	\$79.18	\$27.32	\$67.23	\$0.00
C. FOC-IC (Maintenance Administrato	\$1.29	\$0.66	\$1.43	\$0.00
Total Channel Connect Cost	\$82.56	\$32.15	\$72.00	\$1.25
Total Product Cost	\$152.34	\$40.17	\$92.22	\$9.64

NOTE: May not add due to rounding.

ACCESS TRUNKS - BUS BASIC - Average number of trunks per order (8 trunks)

Cost for white page listing shown on exhibit.